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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

v.

Case: 2:24-cr-20662
Assigned To : Grey, Jonathan J.C.
Referral Judge: Stafford, Elizabeth A.
Assign. Date : 12/4/2024
Description: IND USA V.
DELPHINE-GEORGIANA EPURE ET AL(MC)

D-1 Delphine-Georgiana Epure,
a.k.a. Virginia Petru,
D-2 Leonard Mihaiu,
D-3 Florin Birzan,

Violation:
18 U.S.C. § 1349
18 U.S.C. § 1344(2)
18 U.S.C. § 1708

Defendants.

/

INDICTMENT

The Grand Jury charges:

GENERAL ALLEGATIONS

At all times relevant to this indictment:

1. Chase Bank, Comerica Bank, PNC Bank (Ohio), and other financial institutions not named in this indictment, were all insured depository institutions (as defined in section 3(c)(2) of the Federal Deposit Insurance Act), or otherwise met the definition of “financial institution” set forth in Title 18, United States Code Section 20.
2. Approximately 40 churches or places of worship, located in the Eastern District of Michigan, regularly and routinely received mail from

parishioners, congregants, and other individuals which frequently contained checks and other negotiable instruments.

COUNT ONE
18 U.S.C. § 1349
Bank Fraud Conspiracy

D-1 Delphine-Georgiana Epure

D-2 Leonard Mihaiu

D-3 Florin Birzan

3. The general allegations contained in paragraphs 1 and 2 are realleged and incorporated by reference as though set forth fully herein.

4. Beginning in or around January 2024 and continuing until approximately September 2024, in the Eastern District of Michigan, and elsewhere, defendants DELPHINE-GEORGIANA EPURE, LEONARD MIHAIU, and FLORIN BIRZAN, and other unnamed co-conspirators, did conspire, confederate and agree with each other to commit the crime of Bank Fraud, in violation of Title 18, United States Code, Section 1344; that is, the knowing execution and attempted execution of a scheme to defraud one or more financial institutions and to obtain any of the money or property owned by, and under the custody and control of, a financial institution.

OBJECT OF THE CONSPIRACY

5. The object of the conspiracy was to obtain money under the custody and control of one or more financial institutions, by way of false and fraudulent pretenses and representations.

MANNER AND MEANS

6. From on or around January 2024 through approximately September 2024, DELPHINE-GEORGIANA EPURE, LEONARD MIHAIU, and FLORIN BIRZAN, and other members of the conspiracy, routinely stole mail from dozens of churches throughout southeast Michigan. In some instances, the defendants would steal mail multiple times from the same church mere days apart. On at least one occasion, the defendants traveled to upwards of a dozen churches within approximately two hours.

7. As part of the conspiracy, from on or around January 2024 through approximately September 2024, DELPHINE-GEORGIANA EPURE, LEONARD MIHAIU, and FLORIN BIRZAN, would open the stolen mail looking for negotiable instruments such as checks and money orders.

8. It was further part of the conspiracy that from on or around January 2024 through approximately September 2024, DELPHINE-GEORGIANA EPURE, LEONARD MIHAIU, and other co-conspirators, would negotiate the

instruments at bank ATMs at various financial institutions by depositing them into accounts of persons other than the identified payee.

COUNTS TWO AND THREE

18 U.S.C. § 1344(2)

Bank Fraud

9. Paragraphs 1 through 8, above, are hereby re-alleged by reference.

10. On or about the dates set forth below, in the Eastern District of Michigan, and elsewhere, defendants DELPHINE-GEORGIANA EPURE and LEONARD MIHAIU knowingly executed and attempted to execute a scheme to obtain any of the moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, a financial institution, by means of false and fraudulent pretenses and representations, with each transaction forming a separate count of the indictment:

| Count | Defendant | Date of Fraudulent Deposit | Approximate Amount Obtained | Financial Institutions Holding Accounts |
|-------|--------------------------|----------------------------|-----------------------------|--|
| 2 | DELPHINE-GEORGIANA EPURE | July 16, 2024 | \$905 | Chase Bank Comerica Bank PNC Bank, Ohio |
| 3 | LEONARD MIHAIU | September 11, 2024 | \$875 | Bank of America Plaquemine Bank & Trust |

COUNT FOUR

18 U.S.C. § 1708

Possession of Stolen Mail

D-1 Delphine-Georgiana Epure

D-2 Leonard Mihaiu

D-3 Florin Birzan

11. On or about September 27, 2024, in the Eastern District of Michigan, the defendants, DELPHINE-GEORGIANA EPURE, LEONARD MIHAIU, and FLORIN BIRZAN, did receive and conceal, and unlawfully have in their possession, pieces of mail addressed to and from various churches in the Southeast Michigan area (and items contained therein), which had been stolen, taken, embezzled and abstracted from a letter box which was an authorized depository for mail matter, knowing the said letters to have been stolen, taken, embezzled and abstracted from an authorized depository for mail matter, in violation of Title 18, United States Code, Section 1708.

FORFEITURE ALLEGATION

18 U.S.C. § 981, 18 U.S.C. § 982 and 18 U.S.C. § 2461

1. The allegations contained in Counts One through Three of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 982(a)(2).

2. The allegations contained in Count Four of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture

pursuant to Title 18, United States Code, Section 981(a)(1)(C) and 28 United States Code, Section 2461.

3. Upon conviction of the offense(s) charged in Counts One through Four of this Indictment, defendant shall forfeit to the United States any property which constitutes or is derived from proceeds traceable to the offense(s), pursuant to Title 18, United States Code, Section 981(a)(1)(C) together with Title 28, United States Code, Section 2461 and/or Title 18, United States Code, Section 982(a)(2).

4. Substitute Assets: If the property described above as being subject to forfeiture, as a result of any act or omission of defendant:

- (a) Cannot be located upon the exercise of due diligence;
- (b) Has been transferred or sold to, or deposited with, a third party;
- (c) Has been placed beyond the jurisdiction of the Court;
- (d) Has been substantially diminished in value; or
- (e) Has been commingled with other property that cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) as incorporated by Title 28, United States Code, Section 2461, to seek to forfeit any other property of defendant up to the value of the forfeitable property described above.

5. Money Judgment: Upon conviction of violating 18, United States Code, Sections 1344, 1349 or 1708, defendant shall be ordered to pay the United States a sum of money equal to the total amount of proceeds defendant obtained as a result of such violation(s).

THIS IS A TRUE BILL.

s/ Grand Jury Foreperson
Grand Jury Foreperson

DAWN N. ISON
United States Attorney

s/ Sara D. Woodward
Sara D. Woodward
Assistant United States Attorney
Chief, General Crimes Unit

s/ Stephen Carr
Stephen Carr
Assistant United States Attorney

Dated: December 3, 2024

**United States District Court
Eastern District of Michigan**

Criminal Case Cover

Case: 2:24-cr-20662
Assigned To : Grey, Jonathan J.C.
Referral Judge: Stafford, Elizabeth A.
Assign. Date : 12/4/2024
Description: IND USA V.
DELPHINE-GEORGIANA EPURE ET AL(MC)

NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

| | |
|--|----------------------------|
| Companion Case Information | Companion Case Number: |
| This may be a companion case based upon LCrR 57.10 (b)(4) ¹ : | Judge Assigned: |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | AUSA's Initials: <i>SC</i> |

Case Title: USA v. D1 Delphine Georgiana Epure, et al.

County where offense occurred : Wayne

Check One: **Felony** **Misdemeanor** **Petty**

Indictment/ Information --- no prior complaint.
 Indictment/ Information --- based upon prior complaint [Case number: 24-30432]
 Indictment/ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

Superseding Case Information

Superseding to Case No: _____ **Judge:** _____

- Corrects errors; no additional charges or defendants.
- Involves, for plea purposes, different charges or adds counts.
- Embraces same subject matter but adds the additional defendants or charges below:

Defendant name

Charges

Prior Complaint (if applicable)

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

December 3, 2024

Date

Stephen Carr
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¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.